



National Action Network, Inc.

Reverend Al Sharpton, President & Founder  
Reverend Dr. W. Franklyn Richardson, Chairman

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January 29, 2017

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: **Anders et al. v. Verizon Communications, Inc., et al.**  
**1:16-CV-05654 (VSB)**  
**Response to Plaintiff's Letter Motion Doc. #62**

Dear Judge Broderick,

I am writing on behalf of Reverend Al Sharpton ("Sharpton") and National Action Network ("NAN"), named defendants, in response to that portion of Plaintiff's Letter Motion (Doc. #62) requesting disqualification of Sharpton & NAN's counsel.

We write to advise the Court that the Sharpton/NAN defendants have arranged for new counsel to substitute into this matter for current counsel and will be filing all necessary papers for this to occur.

With that said, counsel wishes to advise the Court that he is deeply offended by Plaintiff's flagrant disregard to make truthful statements. Plaintiffs in their letter through their counsel regarding disqualification state the following:

"Mr. Hardy was involved intricately in the negotiations of the contract, was present when money exchanged hands and was involved in every aspect of the transactions that form the basis of this claim. He was present and participated nearly every contact with the plaintiffs..."  
*Plaintiffs' Letter Doc. #62, p.3.*

These statements are wholly false and complete fabrications. Nor were the statements, as quoted above, included/alleged in Plaintiffs' Second Amended Complaint.

Nevertheless, as stated, Sharpton/NAN defendants are most interested in this matter continuing to proceed in a timely manner and will be promptly substituting new counsel to replace current counsel.

Thank you for your consideration of this matter.

Respectfully submitted,

  
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Michael A. Hardy, Esq.  
General Counsel

MAH:mh:cc:file:anders

cc: Japheth Nthautha Matemu, Esq. (Plaintiffs' Counsel)  
Kauff McGuire & Margolis LLP (Verizon Comm. Inc. & Cellco, defendants)  
c/o Raymond G. McGuire, Esq. & Kristina Cunard Hammond, Esq.